

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

CAMPAIGN LEGAL CENTER;  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION OF TEXAS; MEXICAN  
AMERICAN LEGAL DEFENSE AND  
EDUCATIONAL FUND, INC.; LAWYERS'  
COMMITTEE FOR CIVIL RIGHTS  
UNDER LAW; and DEMOS A NETWORK  
FOR IDEAS AND ACTION, LTD.,

Plaintiffs,

v.

JOHN B. SCOTT, in his official capacity as  
Secretary of State of the State of Texas,

Defendant.

Civil Action No. 1:22-cv-92

**DECLARATION OF CALEB JACKSON**

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am Legal Counsel, Voting Rights at Campaign Legal Center (CLC) and counsel to Plaintiff CLC in this action. I am over age 18 and competent to make this Declaration. The facts set forth in this Declaration are based on my personal knowledge. This Declaration is submitted in support of Plaintiffs' Motion for Preliminary Injunction and to Consolidate Preliminary Injunction Hearing with Trial on the Merits.
2. Attached as Exhibit A is a true and correct copy of Election Advisory No. 2019-02 issued by the Texas Secretary of State's Office on January 25, 2019 announcing the implementation of the 2019 Voter Purge Program.
3. Attached as Exhibit B is a true and correct copy of the April 26, 2019 Settlement

Agreement in *Texas LULAC v. Whitley*.

4. Attached as Exhibit C is a true and correct copy of the August 20, 2021 letter from the Attorney General's Office to counsel regarding new superset data identifying potential non-U.S. citizen registered voters.

5. Attached as Exhibit D is a true and correct copy of the September 14, 2021 letter from the Attorney General's Office to counsel regarding new weekly data identifying potential non-U.S. citizen registered voters.

6. Attached as Exhibit E is a true and correct copy of Tarrant County's proof of citizenship list that I received from Tarrant County Assistant Elections Administrator Troy Harvard on February 22, 2022 showing, *inter alia*, the number of voters identified by the Secretary of State as potential non-U.S. citizens based on DPS data who Tarrant County has confirmed are U.S. citizens. Personally identifying information, including voters' names, Voter Unique Identifiers (VUIDs), and addresses have been redacted for privacy purposes.

7. Attached as Exhibit H is a true and correct copy of Plaintiffs and other organizations' August 27, 2021 NVRA Records Request to Defendant Scott seeking the list of voters targeted by Texas's New Voter Purge Program.

8. Attached as Exhibit I is a true and correct copy of Defendant Scott's September 14, 2021 response to Plaintiffs' August 27, 2021 NVRA request.

9. Attached as Exhibit J is a true and correct copy of Plaintiffs' October 20, 2021 NVRA Notice Letter to Defendant Scott stating that if the NVRA violation was not corrected within 90 days, Plaintiffs would be entitled to file suit in federal court to obtain the requested documents.

10. Attached as Exhibit K is a true and correct copy of Plaintiffs and other organizations' October 20, 2021 NVRA Records Request to Defendant Scott seeking the list of voters targeted

by Texas's New Voter Purge Program.

11. Attached as Exhibit L is a true and correct copy of Defendant Scott's November 3, 2021 response to Plaintiffs' October 20, 2021 NVRA Request.

12. Attached as Exhibit M is a true and correct copy of Plaintiffs' November 15, 2021 NVRA Notice Letter to Defendant Scott stating that if the second NVRA violation was not corrected within 90 days, Plaintiffs would be entitled to file suit in federal court to obtain the requested documents.

13. Attached as Exhibit N is a true and correct copy of Defendant Scott's November 10, 2021 letter to Attorney General Paxton referencing Plaintiffs and other organizations' August 27, 2021 NVRA Records Request.

14. Attached as Exhibit O is a true and correct copy of Defendant Scott's November 10, 2021 letter to Attorney General Paxton referencing Plaintiffs and other organizations' October 20, 2021 NVRA Records Request.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on March 7, 2022 at Washington, District of Columbia.

/s/ Caleb Jackson  
Caleb Jackson